



February 7, 2025

***E-Filed***

The Honorable Vince Chhabria  
450 Golden Gate Avenue  
17th Floor, Courtroom 4  
San Francisco, CA 94102

Re: *Kadrey, et al v. Meta Platforms, Inc.*, Case No. 3:23-cv-03417-VC

Dear Judge Chhabria,

We write on behalf of Defendant Meta Platforms, Inc. (“Meta”).

In the course of preparing the *in camera* submission pursuant to Dkt. 416, Meta and its counsel learned late afternoon yesterday that Meta’s e-discovery vendor had inadvertently sequestered approximately 18,000 documents intended for document review and potential production.<sup>1</sup> Meta is currently in the process of determining how many of those documents are responsive to Plaintiffs’ document requests. Documents from this tranche otherwise would have been reviewed and, if responsive, produced or logged by December 13, 2024.

Upon becoming aware of the issue yesterday, Meta and its counsel took immediate steps to have this error corrected by the vendor, and Meta and its counsel have deployed significant resources to expedite a thorough review of these additional documents.

Meta will, as soon as possible and no later than February 14, 2025, produce to Plaintiffs any responsive documents from this tranche and with respect to any privileged documents, a privilege log. In light of the Court’s current *in camera* review, Meta will also submit a copy of its new privilege log to the Court. Meta will provide a further update to the Court on Monday by 4:00 pm, including regarding the volume and timing of the production and the privilege log.

Meta sincerely apologizes for this issue. If it would be useful to the Court, Meta would welcome a status conference at which it can provide further explanation and receive the Court’s input regarding how to address this issue while minimally disrupting the progress of this case.

/s/ Bobby Ghajar  
/s/ Kathleen Hartnett  
Bobby A. Ghajar  
Kathleen Hartnett  
COOLEY LLP

*Counsel for Defendant Meta Platforms, Inc.*

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<sup>1</sup> Meta is further confirming with the vendor that there were no other inadvertently sequestered documents.